

Remarks

A. Claims in the Case

Claims 1-21 have been rejected. Claims 1, 14, 19, and 21 have been amended. Claims 15 and 20 have been cancelled. Claims 22 and 23 have been added. Claims 1-14, 16-19, and 21-23 are pending.

B. 35 U.S.C. §102(e) Rejections

The Examiner has rejected claims 1-3 and 7-21 under 35 U.S.C. §102(e) as being anticipated by Danovitch, et al. (U.S. Patent No. 6,819,566) (hereinafter "Danovitch"). Applicant respectfully disagrees with these rejections.

Applicant respectfully reminds the Examiner that the standard for "anticipation" is one of fairly strict identity. To anticipate a claim of a patent, a single prior source must contain all the claimed essential elements. *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 U.S.P.Q.81, 91 (Fed.Cir. 1986); *In re Donahue*, 766 F.2d 531, 226 U.S.P.Q. 619, 621 (Fed.Cir. 1985).

Danovitch does not disclose, teach, or suggest at least a "resiliently biased electrically conductive connection member in electrical communication with the shielding portion and operable electrically to connect the shielding portion to a predetermined voltage by bearing down upon an electrically conductive contact (emphasis added)" as recited in claim 1. The compliant member 21 of Danovitch does not "bear down" on the electrically conductive contact. Furthermore, Danovitch teaches away from this feature. Danovitch teaches: "In addition, no pressure is required to be applied between lid 16 and substrate 13 to ensure the compliant member 21 appropriately contacts lid 16 and ground pad 18... (emphasis added) (Danovitch, col. 5, lines 38-41)."

Danovitch also does not disclose, teach, or suggest at least “forming a solder-less detachable electrical connection between the resiliently biased electrically conductive connection member and the electrically conductive contact (emphasis added)” as recited in amended claim 1. Danovitch teaches soldered connections (e.g., see Danovitch, col. 5, lines 30-35). Applicant respectfully asserts claim 1 and claims dependent thereon are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejection to claim 1 and claims dependent thereon.

Claims 14, 19, and 21 recite, among others, a similar feature not disclosed, taught, or suggested by Danovitch. Applicant respectfully asserts claims 14, 19, and 21 are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejections to claims 14, 19, 21 and claims dependent thereon.

C. 35 U.S.C. § 103(a) Rejections

The Examiner has rejected claims 4-6 under 35 U.S.C. § 103(a) as being unpatentable over Danovitch in view of Gonsalves, et al. (U.S. Patent No. 6,212,074) (hereinafter “Gonsalves”). Applicant respectfully disagrees with these rejections.

Applicant respectfully asserts claims 4-6, dependent on patentably distinct claim 1, are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejections to claims 4-6.

D. New Claims

Applicant respectfully asserts the cited art does not disclose, teach, or suggest at least “a substrate, wherein the substrate comprises at least one electrically conductive contact; an integrated circuit coupled to the substrate; an electrically conductive shield mountable adjacent the integrated circuit; a biasing element coupled to the electrically conductive shield; a connection member, wherein the connection member is biased onto the electrically conductive


contact by the biasing element and wherein the connection member forms a detachable electrical connection between the electrically conductive shield and the electrically conductive contact” as recited by new claim 22 or “wherein the biasing element is a spring, and wherein the biasing element compresses as the connection member is biased onto the electrically conductive contact” as recited by new claim 23.

E. Summary

Based on the above, Applicant submits that all of the claims are in condition for allowance. Favorable reconsideration is respectfully requested.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel Deposit Account No. 50-1505/5681-78000/BNK.

Respectfully submitted,



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